



The New York Times
Company

David E. McCraw
Senior Vice President
& Deputy General Counsel January 2, 2024

T 212 556 4031
mccraw@nytimes.com

620 8th Avenue
New York, NY 10018
nytimes.com

VIA ECF

The Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Braun, et al., No. 10-cr-433-KAM — Request to
Adjourn Briefing Dates

Dear Judge Matsumoto:

I represent The New York Times Company (“The Times”) in its motion to unseal certain court records in this matter. I respectfully make this application with the consent of counsel for the Government and for Mr. Braun.

The Times and Mr. Braun are actively discussing a resolution of this dispute that would obviate the need for adjudication of The Times’s motion. Accordingly, we ask that all briefing deadlines set by the Court in its Order of December 19, 2023 be adjourned by two weeks to allow time for completion of the current discussions. Under the proposed adjourned schedule, responses to The Times’s motion would be due on January 19, 2024 with The Times’s reply due on January 26, 2024. Counsel for Mr. Braun and The Times will notify the Court and the Government on or before January 16, 2024 whether a resolution has been reached and The Times has decided to withdraw its motion.

We thank the Court for its consideration.

Respectfully submitted,

David McCraw

David E. McCraw

cc: Counsel of record (by ECF)